

Fixed line number portability- summary report from FCS October 2009

Summary

There is a growing demand from the fixed line and VoIP Communication Providers for reform of the fixed line number portability system. They report that customers suffer detriment due to the uncertainty as to when their number is to be ported and service provided. The loss of service when porting from LLU providers is a particular concern. FCS conducted a survey in September 2009 and respondents called for the Ofcom Central Database project to be revisited and for the porting process to be automated. We recommend that Ofcom follows up on this brief survey to understand in more depth the nature of the problems with fixed line number portability and what remedies can be put in place.

Introduction

For the past 2 years FCS has been closely involved with Ofcom's evolving number portability policies. Following the demise of UK Porting in September 2008 an Ofcom team worked to consider again changes in number porting policy. The consultations issued on 3 August 2009 looked only at [Mobile number](#) portability and [call routing](#), referring fixed number portability to an undefined project on fixed migrations and mis-selling.

FCS conducted a short survey among its Comms Provider members in September 2009 to understand their views on the fixed number porting process and has received feedback that for some there are more problems and uncertainties associated with the fixed number portability than mobile number portability.

Results

Respondents reported that they used various carriers in particular, Openreach, BT Wholesale, Gamma and Opal. Companies responding to this survey generally ported up to 200 numbers per month.

Average porting times between WLR, LLU and VoIP ranged from 10- 25 working days. However the longest time taken was generally double this and one CP cited 100 days "and still going". In comparison the time taken in Sweden to port WLR to WLR is 5 days and the longest time reported is 30 days.

One third of respondents reported that the time taken to port had increased in the past year.

Issues raised by the survey

- Customers can lose service for more than a day with no incoming calls, and sometimes no outgoing calls, because the line has not been released from the LLU switch; this situation can result in the customer being billed by both the losing and gaining CP simultaneously;

- Customers complain about the uncertainty as to when they will be able to receive their new service; the CP also does not know when the number will be ported;
- CPs cannot port a number onto any network where bilateral agreements do not exist between the networks; it can take up to 1 year to finalise a bilateral porting agreement;
- There are hundreds of fixed and non geo number range holders – it would be a massive task to have bilateral agreements between them all unless there is a central database;
- Impact of the current processes on the CP company- more staff resources are needed as the processes are not automated;
- In Sweden fixed and mobile porting is an essential and critical part of the migration process carried out by the CP's implementation team;
- There is confusion in terminology- a number can be “migrated” between two LLU providers whereas number transfer between LLU and WLR is classed as “porting”;
- Other orders (e.g. to provide network services such as Call Diversion) cannot be raised on the line when a port order is in the system;
- There is no facility to pre-check line type, associated numbers, DDI ranges, address of DDI;
- The communication between losing SP and gaining SP is not very descriptive, more information is needed to be passed and flexibility when direct requests are in progress with the client;
- The mgnp for WLR sometimes comes back in 4 hours sometimes 4 days with no consistency,
- The donor CP can refuse a porting request for what seem to be very minor data mismatches e.g. if the CLI is correct but the road name is slightly different;
- Concern that to port an existing landline number to VoIP the CP will have to install a second line, as the original line goes dead; this is “an unworkable situation”;
- ISDN porting times are lengthy

Recommendations

Respondents agreed that the fixed line porting process is an essential element in the customer migration process and is in need of reform, particularly as the VoIP market grows, and they proposed:

- The proposal for a Central Database should be implemented to ensure all CPs can have the same agreement without the need for multiple bilateral agreements;
- A new order should be possible on a line whether or not it is being ported;
- Number portability should be automated with an online portal for submitting and amending orders and tracking the transfer;
- The LLU line should be stopped or ceased at the same time as number port goes through, not before, and not used as a reason to delay;
- A new VoIP service should not require a second line when porting a landline number;
- Shorter and certain leadtimes – no more than 5 days reducing to 48 hours or 1 day to comply with the revised EC Framework Directive;
- Ofcom should encourage better co-operation between carriers, with penalties for non-co-operation;
- CPs should be able to use the ported numbers to do renumbers and add caller Redirect and RCF on the numbers which are ported from LLU providers; unfortunately CPs are not able to provide the service on LLU ported numbers which leads to a lot of unhappy customers;
- Ofcom should follow up on this survey.